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17 *Attorneys for Defendants*  
18 *Nevada Department of Transportation,*  
19 *Wilson Marshall, and Sonnie Braih*

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 KENDRICK CRAWFORD,

23 Plaintiff,

24 vs.

25 NEVADA DEPARTMENT OF  
26 TRANSPORTATION, a Department of the  
27 State of Nevada; WILSON MARSHALL, an  
28 individual employed by the State of Nevada;  
and SONNIE BRAIH, an individual  
employed by the State of Nevada,

29 Defendants.

30 Case No. 2:17-cv-00655-GMN-PAL

31 **STIPULATION AND ORDER TO  
32 EXTEND TIME TO RESPOND TO  
33 PLAINTIFF'S COMPLAINT**

34 **(First Request)**

35 Plaintiff, KENDRICK CRAWFORD, by and through his counsel MARY F.  
36 CHAPMAN, and Defendants NEVADA DEPARTMENT OF TRANSPORTATION, a  
37 Department of the State of Nevada, WILSON MARSHALL and SONNIE BRAIH, individuals  
38 employed by the NEVADA DEPARTMENT OF TRANSPORTATION (NDOT), by and  
39 through legal counsel, ADAM PAUL LAXALT, Attorney General, CAMERON P.  
40 VANDENBERG, Senior Deputy Attorney General, and DOMINIK A. BATTEN, Deputy

1 Attorney General, and pursuant to Local Rules IA 6-1 and IA 6-2, hereby stipulate and agree to  
2 extend by 30 days the time for Defendants to respond to Plaintiff's complaint. Therefore, the  
3 last day for Defendants to answer or otherwise respond to Plaintiff's complaint is April 10,  
4 2017.

5 The current deadline for Defendants to respond to Plaintiff's complaint is March 10,  
6 2017.

7 Counsel for Defendants seeks additional time because of pre-existing litigation/  
8 administrative obligations. Counsel's office is currently understaffed by three attorneys and  
9 additionally, Deputy Attorney General Batten was on substantial family medical leave until  
10 recently, and is out of the office on additional family medical leave from March 10 until March  
11 14.

12 This is the first extension of time requested by Defendants to file their Answer.

13 Dated: March 7, 2017

Dated: March 7, 2017

14 ADAM PAUL LAXALT  
15 Attorney General

LAW OFFICE OF MARY F. CHAPMAN, LTD.

16 By: /s/ Dominika J. Batten  
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23 Nevada Department of Transportation,  
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By: /s/ Mary F. Chapman  
MARY F. CHAPMAN  
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8440 W. Lake Mead Blvd., Suite 203  
Las Vegas, NV 89128  
24 Attorney for Plaintiff

25 **IT IS SO ORDERED.**

26 Dated this 10th day of March, 2017.

27   
28 UNITED STATES MAGISTRATE JUDGE